

**Testimony of Sterling Miller Ph.D.**

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**Missoula, Montana**

**Thoughts on Montana's wolves**

**Environmental Quality Council**

**May 7, 2009**

Thank you for the opportunity to present these perspectives on issues before the Environmental Quality Council. I present these thoughts on behalf of the National Wildlife Federation's Northern Rockies and Prairies Natural Resource Center based in Missoula. My background includes 12 years with the National Wildlife Federation and 21 years as a wildlife biologist with the Alaska Department of Fish and Game. I received my undergraduate degree in Wildlife Biology at the University of Montana in 1968. I am currently an affiliate professor of Wildlife Biology at the University of Montana and at the University of Alaska Fairbanks. I have published numerous peer-reviewed scientific papers and other publications and have been elected president of 2 professional societies of wildlife biologists. Some of my research in Alaska involved investigations of predator-prey relationships.

**Thoughts on *Echinococcus*.**

Like Dr. Val Geist, I am not a parasitologist so definitive comments on parasite issues should be based on testimony from parasite experts. I have read Dr. Giest's testimony to the EQC and, as a scientist, I am disappointed in him for the case he makes on *Echinococcus* being a threat to Montana. Dr. Geist advances very little evidence in support of his concerns and the evidence he does advance is anecdotal and non-systematic. He does not build anything close to a convincing case that *Echinococcus* represents a significant public health hazard to Montana's hunters and citizens. If he were to try to get his views on this issue published in a peer-reviewed journal, it would be rejected because the evidence he advances is so thin. While it is true that humans occasionally become alternative intermediate hosts for hydatid tapeworm, this does not mean that this is a significant public health risk. There are many other things including bee stings and lightning strikes that occasionally cause death or injury to humans that, like *Echinococcus*, do not rise to the level where public health officials need to do more than issues cautions about avoiding the concerns that will affect a very small number of people.

Dr. Geist implicitly acknowledges this failing but attributes it to lack of study of specific populations at high risk. However, there have been such studies in Canada and Alaska (cited in State of Alaska *Echinococcus* brochure). These show somewhat higher hydatid infection rates than populations in urban areas as would be expected. Even in these at high risk populations,

however, infection rates and morbidity is low. If hydatid disease were a serious health issue that should concern Montana hunters, it would have long ago been evident as a morbidity factor in Alaskan villages and other rural areas where wolves are abundant as well as domestic dogs and where a higher percentage of people eat a lot of wild ungulate meat (moose and caribou). Dr. Geist suggests that lack of evidence for his concerns represents a lack of focus on at risk populations but it is more likely to reflect the fact that a significant public health issue does not exist.

I worked, hunted and ran dogs in Alaska for 21 years. I've killed and eaten many ungulates (caribou and moose) in areas where wolves were abundant. Some of these may have had hydatid cysts but I never noticed them. Neither did any of my hunting partners or friends. My observations in this regard are, like Dr. Geist's, anecdotal. However, the fact that the Alaska Department of Fish and Game does little more but notify people who might observe these cysts in the animals they take that there is little public health concern associated with them should and does suffice to eliminate concerns by the few people who take a moose or caribou with these cysts. This does not mean that that some risk does not exist. It is always wise to avoid avoidable risks; I would advise anyone to avoid standing under a solitary tree during a lightning storm and I would similarly recommend be cautious in handling wolf feces or field dressing any game animal. Most of us are appropriately cautious in both cases and do not need to lose a lot of sleep over risks associated with either.

This said, I have never fed my dogs with offal from wild ungulates for many reasons and would recommend that others do the same. I live in an area open to hunting and my dogs sometimes get into gut piles regardless of my preferences. I don't lose any sleep over this but do try and clean up any gut piles I find in areas where my dogs get into them. This is primarily because I don't want my dogs eating rotten stuff they encounter.

Cronic wasting disease is a more serious public health hazard from wildlife but it would be a similar overreaction to ban domestic sheep grazing (the likely source of the prions involved) over this concern. I don't hear these same individuals calling for the eradication of domestic sheep, but there is something about wolves that causes people to be irrational. Dr. Geist excepted, it appears that most of the concern over *Echinococcus* comes from individuals who are looking for any excuse to vent their frustrations over the presence of wolves in Montana or who are running for public office. I recommend that the EQC not overreact to this venting. Even if there were substance to these concerns, those expressing them only offer draconian reductions to wolf populations as a solution. It appears clear that concerns over *Echnnococcus* in Montana is based more on dissatisfactions with wolves than with real public health problems associated with hydatid disease .

### **Legal status of wolves in Montana**

The National Wildlife Federation appreciates the frustration the legislature and citizens of Montana feel over the legal barriers involved in getting ESA species like wolves delisted once recovery targets have been achieved. We have strongly supported delisting grizzly bears in the Yellowstone Ecosystem because, thanks to the professionalism of the state and federal agencies involved, appropriate grizzly bear management plans have been developed. Unfortunately, the same situation does not exist for wolves in the Northern Rockies where only Montana and Idaho have plans that are appropriate for managing delisted wolves and Wyoming does not. The US Fish and Wildlife Service has attempted to make an end run around Wyoming's bad plan by delisting wolves only in Montana and Idaho. It is far from certain, that this end run will pass judicial scrutiny regardless of how many wolves there are in Montana and Idaho and how well they are managed by these states. Correspondingly, it is very possible that northern Rockies wolves will be relisted by judicial fiat and that this will exacerbate the frustration that exists over wolf management in the northern Rockies.

Although frustration is understandable, Montana has choices about how to deal with the situation and some choices are productive and others counter-productive. The most counter-productive action would be one which supports contentions by litigants opposing wolf delisting based their preference for continued federal management under the Endangered Species Act. This will never get Montana to where it needs to be in terms of wolf management. The more productive path for Montana is one which will lead to continued responsible management of Montana's wolves by the State of Montana. Continuation of Montana path of responsible management will lead to state management and state involvement in management until delisting is achieved. Indulgent posturing over wolves like we see by some politicians in Wyoming won't achieve the result of wolf management by the State of Wyoming. The same is true for Montana. Wyoming's approach to this issue is akin to breaking the mirror because you don't like the image it reflects back. It substitutes an unproductive and juvenile temper tantrum for rational actions toward a productive and desired outcome.

The problem the Fish and Wildlife Service has identified with Wyoming's plan is that it creates a dual status for wolves. Under Wyoming's plan wolves are big game animals near Yellowstone Park and predators that can be shot on sight elsewhere. Should Montana decide to adopt an approach that had similar dual status based on arbitrary criteria such as elevation similar to British Columbia or an approach that had a year-long season, Montana would end up back on the sideline watching the federal government manage wolves with little to no regard for Montana's big game and wolves would remain listed for a very long time. Montana's plan would change from one that is adequate from the standpoint of Endangered Species Act to one that is inadequate under the ESA. Such actions would assure that wolves remain listed regardless of how many there are.

Frustration with the slow pace and numerous obstacles to delisting is understandable. Adoption of policies that will reverse direction and make the situation worse, however, would be a poor public policy choice.

Montana's wolf management plan was designed to be adaptive to new circumstances and information. After one year of implementation, it appears appropriate to increase the quota for wolves using the same or similar geographic quota system boundaries. I defer to the biologists in the Department on how much of an increase is desirable and suggest that this body do the same. History provides few examples where better management resulted when elected political figures substitute their judgment on details as quotas for that of trained professional biologists. The same usually applies for NGOs which is why I make no specific recommendation on quotas here.

In conclusion, I make the observation that in terms of wolf management Montana has done the best job of the 3 states in the Northern Rockies. Montana Fish, Wildlife and Parks has competent staff who have worked hard to find the difficult balance among the complex and sometimes competing interests and opinions of livestock owners, hunters, federal agencies and wolf advocacy organizations. The legislature shouldn't try to tinker with this balance. It has been difficult too to get the wolf population in the Great Lakes returned to state management but it appears that responsible behavior by Minnesota, Wisconsin, and Michigan is finally about to achieve this desired outcome. Thanks for the opportunity to comment.